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July 25, 1997

VIA FEDERAL EXPRESS

Clifford J. Villa
 U.S. Environmental Protection Agency, ORC-158
 Office of Regional Counsel
 1200 Sixth Avenue
 Seattle, WA 98101

Re: Request for Information Pursuant to Section 104(e) of CERCLA
Coeur d'Alene Basin, Northern Idaho

Dear Mr. Villa:

Enclosed please find the responses of Group R Co., Inc., The Marmon Corporation and The Marmon Group, Inc. to the referenced information request. Documents responsive to the request are enclosed and bates numbered LS 00001 - LS 002521. A privilege log is also enclosed. Due to time constraints, we are unable to provide you with a signed declaration for each of the responses at this time. However, we anticipate forwarding signed declarations to you next week. If you have any questions, please feel free to contact me.

Very truly yours,


 Michael David Lichtenstein

MDL:nap

Enclosures

cc: Elizabeth Loeb, Esq. (w/out encls.)

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INTRODUCTION

This document constitutes the response of **Group R Co., Inc.** ("Group R Co.") to an information request received from the U.S. EPA on or about July 2, 1997. Pursuant to agreement with U.S. Department of Justice attorney Elizabeth Loeb, this response is to be served on or before July 25, 1997. The information contained herein was derived solely from historical documents currently within the possession and control of Group R Co. Group R Co. has made a good faith effort to understand and interpret the documents in order to be responsive to the specific questions asked by U.S. EPA. However, the "facts" set forth in this response are not based on personal knowledge of anyone currently employed by Group R Co. and Group R Co. reserves the right to supplement or amend these answers should new and verifiable information contradict or require modifications to the interpretation given to the available documents.

GENERAL OBJECTIONS

1. While Group R Co. recognizes that the U.S. EPA is under a court-ordered deadline for making decisions concerning the addition of parties to ongoing litigation related to the Coeur d'Alene Basin, Group R Co. objects to the minimal amount of time which it was provided to research and prepare responses to this information request. Group R Co. has made its best efforts in the limited amount of time provided to accurately respond to this request.

2. The information relied upon to respond to this information request was gathered solely from historical documents maintained by Group R Co. Given the time limits for answering this request, it is unreasonable and unduly burdensome (as well as practically impossible) to list all documents relied upon in preparation of each answer. However, all documents relied upon to prepare the answers have been provided herewith. The documents provided have been organized by the number of the question to which they respond. However, the fact that a particular document has been identified as responsive to a particular question or questions does not mean that it does not contain information relevant to other questions and should not be taken as an admission that Group R Co. has any liability for the current condition of the Coeur d'Alene Basin.

3. Group R Co. objects to the definition of the term "You" or "Respondent" on the grounds that it is overbroad and calls for a legal conclusion as to what are "predecessor or successor corporations or companies." Notwithstanding this objection, Group R Co. will provide information relating to the activities of Golconda Lead Mines, Inc., Golconda Mining Corporation, Golconda Corporation, RegO Company and The RegO Group, Inc. when responding to this information request. In so doing, Group R Co. expressly preserves the legal and factual argument that (a) Golconda Lead Mines, Inc., Golconda Mining Corporation and Golconda Corporation are not legal or factual predecessors of RegO Company, The RegO Group, Inc. and Group R Co. and (b) RegO Company, The RegO Group, Inc. and Group R Co. are not legal or factual successors of Golconda Lead Mines, Inc., Golconda Mining Corporation and Golconda Corporation.

4. Group R Co. objects to the instruction requiring it to seek out former employees or agents as unreasonable, unduly burdensome and beyond the statutory authority of the U.S. EPA pursuant to section 104(e) of CERCLA.

5. Group R Co. objects to the instruction requiring it to continually supplement its response as unreasonable, unduly burdensome and beyond the statutory authority of the U.S. EPA pursuant to section 104(e) of CERCLA.

6. Group R Co. will provide a privilege log for any responsive documents that it has not produced as quickly as practically possible given the short time frame for responding.

INFORMATION REQUEST QUESTIONS

1. General Information About Respondent

NOTE: All questions in this section refer to the present time unless otherwise indicated.

a. Provide the full legal name and mailing address of the Respondent.

**Group R Co., Inc.
225 West Washington Street
Chicago, IL 60606
Attn. Robert W. Webb, Esq.**

b. For each person answering these questions on behalf of Respondent, provide:

These responses were prepared by Group R Co.'s counsel.

i. full name;

Lowenstein, Sandler, Kohl, Fisher & Boylan

ii. title;

N/A.

iii. business address;

**65 Livingston Avenue
Roseland, NJ 07068**

iv. business telephone number and FAX machine number.

**(973) 992-8700 (phone)
(973) 992-5820 (fax)**

- c. If Respondent wishes to designate an individual for all future correspondence concerning this Facility, including any legal notices, please so indicate here by providing that individual's name, address, telephone number, and FAX number.

**Michael L. Rodburg, Esq.
Lowenstein, Sandler, Kohl, Fisher & Boylan
65 Livingston Avenue
Roseland, NJ 07068
(973) 992-8700 (phone)
(973) 992-5820 (fax)**

- d. State every address within the Coeur d'Alene Basin at which the Respondent conducted business during the period being investigated¹.

Group R Co. objects to the term "conducted business" as vague and ambiguous. Notwithstanding this objection, Golconda Lead Mines, Inc. owned and operated a mine and a mill located north of the Osburn fault, between Wallace and Mullan, Idaho.

- e. State the dates during which it conducted business at each such location.

Group R Co. objects to the term "conducted business" as vague and ambiguous. Notwithstanding this objection, Golconda Lead Mines, Inc. operated the mine from approximately 1927 - 1957 and the mill from approximately 1928 - 1960.

- f. Describe the nature of Respondent's current business at each such location, including, but not limited to, a brief description of the major products or services Respondent manufactures or provides.

Group R Co. objects to the term "conducted business" as vague and ambiguous. Notwithstanding this objection, the mine and mill were sold to Harry F. Magnuson on December 30, 1976. Group R Co. is without knowledge as to whether any operations are still conducted there.

- g. List the Standard Industrial Classification (SIC) code for the business at each location.

Group R Co. is without knowledge as to the SIC code utilized by Golconda Lead Mines, Inc. or by any subsequent entity.

¹ If the Respondent has conducted business at more than three locations in this area, please contact the EPA representative listed in the cover letter to determine the appropriate scope of your response.

h. Describe the nature of the Respondent's business at each location during the period being investigated.

Golconda Lead Mines, Inc. operated a mine and a mill within the Coeur d'Alene mining district from approximately 1927 - 1960. After that time, Golconda Lead Mines, Inc. and Golconda Mining Corporation (beginning in 1962) apparently ceased active mining operations and limited activity to the collection of mining properties through direct land purchases and the acquisition of stock in companies holding land within the Coeur d'Alene mining district. Golconda Mining Corporation also appears to have conducted limited exploratory activities within the Coeur d'Alene mining district to protect unpatented claims that it owned and that were owned by companies in which it owned stock. On December 30, 1976, Golconda Corporation appears to have sold all of its mining assets located within the Coeur d'Alene mining district to Harry F. Magnuson.

2. Ownership Interests and Other Activities within the Coeur d'Alene Basin

a. Provide all documents relating to the following activities occurring within the Coeur d'Alene Basin:

i. Your ownership or leasing of mines;

Documents related to ownership or leasing of mines by Golconda Lead Mines, Inc., Golconda Mining Corporation and Golconda Corporation are being provided herewith.

ii. Your operation of mines;

Documents related to the operation of a mine by Golconda Lead Mines, Inc. are being provided herewith.

iii. Your ownership or leasing of mining claims and patents;

Documents related to the ownership of mining claims or patents by Golconda Lead Mines, Inc., Golconda Mining Corporation and Golconda Corporation are being provided herewith.

iv. Your ownership or leasing of mills, smelter complexes, or other facilities in which ore is processed or refined;

Documents related to the ownership and/or leasing of a mill, in which ore was processed and/or refined, by Golconda Lead Mines, Inc., Golconda Mining Corporation and Golconda Corporation are provided herewith.

v. Your operation of mills, smelter complexes, or other facilities in which ore is processed or refined;

Documents related to the operation of a mill in which ore was processed and/or refined by Golconda Lead Mines, Inc. are provided herewith.

vi. Your transportation of ore, mining wastes, or other materials related to mining activities;

No documents responsive to this request were discovered during the search conducted on behalf of Group R Co.

vii. Information concerning the generation, use, purchase, treatment, processing, refinement, discharge, storage, disposal, placement, or other handling of mining wastes and/or materials at, or transportation of mining wastes and/or materials to, the Coeur d'Alene Basin;

No documents responsive to this request were discovered during the search conducted on behalf of Group R Co.

viii. Your ownership or leasing of real property where mine tailings and other mining waste have been discharged, deposited, stored, disposed of, or placed, or otherwise come to be located.

No documents related to this request were discovered during the search conducted on behalf of Group R Co.

b. Provide all environmental studies and/or audits regarding your involvement in the Coeur d'Alene Basin.

Group R Co. objects to the term "environmental studies and/or audits" as vague and ambiguous. Notwithstanding this objection, no documents related to this request were discovered during the search conducted on behalf of Group R Co.

c. Provide all documents related to any activities of the following entities in the Coeur d'Alene Basin:

Group R Co. objects to this request on the grounds that searching for documents related to the mining activities of the entities listed below in question 2(c)(i) - (xiv) is unduly burdensome and beyond the scope of EPA's authority pursuant to section 104(e) of CERCLA. Notwithstanding this objection, Group R Co. did discover certain documents during its document search that are responsive to this request and those documents are provided herewith.

i. ASARCO, Inc. and all predecessors, successors, subsidiaries, and affiliates;

ii. Hecla Mining Company and all predecessors, successors, subsidiaries, and affiliates;

iii. Bunker Hill Limited Partnership and all predecessors, successors, subsidiaries, and affiliates;

iv. Sullivan Mining Company and all predecessors, successors, subsidiaries, and affiliates;

v. Gulf USA Corporation, formerly known as Gulf Resources & Chemical Corporation and all predecessors, successors, subsidiaries, and affiliates;

vi. Pintlar Corporation, formerly known as the Bunker Hill Company, and all predecessors, successors, subsidiaries, and affiliates;

vii. Sunshine Mining Company and all predecessors, successors, subsidiaries, and affiliates;

viii. Sunshine Precious Metals, Inc. and all predecessors, successors, subsidiaries, and affiliates;

ix. Coeur d'Alene Mining Company and all predecessors, successors, subsidiaries, and affiliates;

x. Callahan Mining Company and all predecessors, successors, subsidiaries, and affiliates;

xi. Union Pacific Railroad and all predecessors, successors, subsidiaries, and affiliates;

xii. Northern Pacific Railroad and all predecessors, successors, subsidiaries, and affiliates;

xiii. Burlington Northern Railroad and all predecessors, successors, subsidiaries, and affiliates;

xiv. Any other companies, entities, or persons that have owned or operated mines in the Coeur d'Alene Basin of northern Idaho.

d. Provide all documents concerning your involvement in any contracts or other agreements relating to mining activities in the Coeur d'Alene Basin, including but not limited to:

i. All contracts for the processing of ore or concentrates at Bunker Hill Mining Company and all predecessors, successors, subsidiaries, and affiliates;

No documents related to this request were discovered during the search conducted on behalf of Group R Co.

ii. All documents related to the shipment of ore or concentrates to Bunker Hill Mining Company and all predecessors, successors, subsidiaries, and affiliates;

No documents related to this request were discovered during the search conducted on behalf of Group R Co.

iii. All documents related to the shipment of ore or concentrates to you from Bunker Hill Mining Company and all predecessors, successors, subsidiaries, and affiliates;

No documents related to this request were discovered during the search conducted on behalf of Group R Co.

iv. All documents related to any specifications, requirements or procedures for the processing of ore or concentrates at the Bunker Hill Mining Company and all predecessors, successors, subsidiaries, and affiliates;

No documents related to this request were discovered during the search conducted on behalf of Group R Co.

v. All documents related to the ownership of ore or concentrates you shipped to, or received from, the Bunker Hill Mining Company and all predecessors, successors, subsidiaries, and affiliates;

No documents related to this request were discovered during the search conducted on behalf of Group R Co.

e. Provide all documents related to your financing of any business involved in mining activities in the Coeur d'Alene Basin.

All documents related to the financing of any business involved in mining activities in the Coeur d'Alene Basin by Golconda Lead Mines, Inc., Golconda Mining Corporation and Golconda Corporation are being provided herewith.

f. Provide all documents related to your ownership of an interest in any entity or business that owned or conducted mining activities in the Coeur d'Alene Basin.

All documents related to the ownership of an interest in any entity or business that owned or conducted mining activities in the Coeur d'Alene Basin by

Golconda Lead Mines, Inc., Golconda Mining Corporation and Golconda Corporation are being provided herewith.

g. Provide all documents related to your participation in the management of any entity or business that owned or conducted mining activities in the Coeur d'Alene Basin.

All documents related to the participation in the management of any entity or business that owned or conducted mining activities in the Coeur d'Alene Basin by Golconda Lead Mines, Inc., Golconda Mining Corporation and Golconda Corporation are being provided herewith.

3. Information About Others

a. If you have information concerning operations within the Coeur d'Alene Basin or the source, content, or quantity of materials placed/disposed within the Coeur d'Alene Basin that is not included in the information you have already provided, provide all such information.

To the best of Group R Co.'s knowledge, all responsive documents, to the extent they exist, have been provided herewith.

b. If not already included in your response, if you have reason to believe that there may be persons able to provide a more detailed or complete response to any of these questions or who may be able to provide additional responsive documents, identify such persons and the additional information or documents that they may have.

N/A.

c. If not already provided, identify all persons, including Respondent's current and former employees, who have knowledge or information about the generation, use, purchase, treatment, storage, disposal, placement, or other handling of materials at, or transportation of materials to, the Coeur d'Alene Basin.

N/A.

4. Compliance with This Request

a. Describe all sources reviewed or consulted in responding to this request, including, but not limited to:

Group R Co. has reviewed all documents within its custody and control that were believed to contain information responsive to this information request.

i. the names of all individuals consulted;

N/A.

ii. the current job title and job description of each individual consulted;

N/A.

iii. the job title and job description during the period being investigated of each individual consulted;

N/A.

iv. whether each individual consulted is a current or past employee of Respondent;

N/A.

v. the names of all divisions of Respondent for which records were reviewed;

The historical records of Group R Co. are centrally located and all of these records were searched.

vi. the nature of all documents reviewed;

The documents reviewed represented the historical records of any activities related to mining in the Coeur d'Alene mining district.

vii. the locations where those documents reviewed were kept prior to review; and

The records were stored in off-site storage facilities in Chicago, Illinois and on-site at the offices of The Marmon Group, Inc. in Chicago Illinois.

viii. the location where those documents reviewed are currently kept.

The original records remain at these locations.